



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

FILE COPY

EMISF 18.2 01
RECEIVED

JUN 03 2002

OFFICE OF WASTE
& CHEM. MGMT.

224 South Arthur • Pocatello, Idaho 83204-3202 • (208) 236-6160

Dirk Kempthorne, Governor
C. Stephen Allred, Director

Hand Delivered

3/23/01

March 23, 2001

Mr. Leon Pruitt
Environmental Support Manager
J. R. Simplot Company
P.O. Box 912
Pocatello, Idaho 83204

USEPA SF



1450561

Dear Mr. Pruitt:

The Idaho Department of Environmental Quality (DEQ) received the Work Plan for the CY 2001 Fluoride Survey and has the following comments:

- 1) The list of field at least 15 sampling locations must be submitted to DEQ by May 1, 2001 for approval.
Final approval or rejection of the work plan will be on or before June 1, 2001.
- 2) Prior DEQ approval must be obtained before a field sampling location is changed or removed.
- 3) During the selection of the field locations no sampling shall take place on land which receives JR Simplot wastewater land application.
- ④ 4) All sampling locations shall be on State land as opposed to Sho-Ban Tribal lands.
- 5) The protocol states that "Samples shall be taken from standing forage." In the past fluoride sampling survey samples were taken from cut forage. The Fluoride Work Plan shall include the recording of the height of the standing vegetation and samples shall not be taken on cut forage.
- 6) If a sample is missed due to the forage being cut, too short, etc. the sample shall be made up as soon as the conditions allow for sampling.
- 7) In past reports, the calibration curve at a maximum was calibrated to 10 ppm, some sample concentrations were 60-80 ppm. Care must be taken during sample analysis to ensure that the calibration curve range is large enough to accurately determine sample concentrations.

Failure to have an approved protocol or strictly adhere to an approved test protocol may result in rejection of the fluoride survey results.

If you have questions concerning the review of this test protocol, please contact me at (208) 236-6160.

Sincerely,



Richard W. Elkins
Air Quality Science Officer

cc: T. Trumbull
AFS/SF (077-00006)
(Johnna Stewart)

B. Goehring
PRO Source File